

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

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Index No.: 101501-18

Rahul Manchanda,

Plaintiff,

SUMMONS

-against-

Plaintiff's Address:
30 Wall Street, 8th Floor
New York, NY 10005

NEW YORK
COUNTY CLERK'S OFFICE

NOV 13 2018

NOT COMPARED
WITH COPY FILE

Nicole Matties, Nicola Shapiro,
Douglas Senderoff, Roger Blank,
Aaron Minc, Daniel Powell, Matt
O'Buck, Sharie O'Buck, Kate Bose,
New York FBI, NYPD, Joe Hendrix,
Andre De Castro, Jamie Wozman, Mark
Anesh, Corey Cohen, A Michael Furman,
Paula Ashcraft.

Defendants.

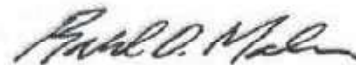
The basis of the venue is the
Address of Plaintiff

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To the Above-named Defendant:

YOU ARE HEREBY SUMMONED to appear in the Supreme Court of the City of New York, County of New York at the office of the said court at 60 Centre Street, New York, New York, 10007, in the County of New York, within the time provided by the law as noted below and to file your answer to the annexed complaint with the Clerk; upon your failure to answer, judgment will be taken against you together with the costs of this action.

Dated: New York, New York
November 11, 2018



Roger Blank, Esq.
387 Park Avenue South 5th Floor
New York, New York 10026

By: Rahul Manchanda, Esq.
30 Wall Street, 8th Floor
New York, New York 10005
Tel: (212) 968-8600
Fax: (212) 968-8601

NOTE: The law provides that (a) if this summons is served by its delivery to you personally within the City of New York, you must appear and answer within TWENTY (20) days after such service; or

(b) if this summons is served by delivery to any person other than you personally, or is served outside the City of New York, or by publication, or by any means other than personal delivery to you within the City of New York, you are allowed THIRTY (30) days after proof of service thereof is filed with the Clerk of the Court within which to appear and answer.

SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF NEW YORK

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Rahul Manchanda,

Plaintiff,

FOURTH AMENDED COMPLAINT

-against-

Index No.: 101501-18

Nicole Matties, Nicola Shapiro,
Douglas Senderoff, Roger Blank,
Aaron Minc, Daniel Powell, Matt O'Buck,
Sharie O'Buck, Kate Bose, New York FBI,
NYPD, Joe Hendrix, Andre De Castro,
Jamie Wozman, Mark Anesh, Corey Cohen,
A Michael Furman, Paula Ashcraft.

NEW YORK
COUNTY CLERK'S OFFICE

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Defendants.

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Plaintiff, Rahul Manchanda, for its complaint against defendants alleges:

1. Plaintiff, at all times relevant hereto, is located at 30 Wall Street, 8th Floor, New York, NY 10005.
2. Defendants also predominantly reside and work in New York City.
3. Defendants have written to Plaintiff that he had only 7 days from October 5, 2018 to pay them \$300,000 in cash otherwise they would leak/release illegally obtained information and audio/video recordings as described herein to the public in order to terrorize, blackmail, extort, threaten, humiliate, embarrass, and harass the Plaintiff and his family and business.
4. Plaintiff urgently and immediately requests the issuance of a Temporary Restraining Order ("TRO") and Permanent Injunction preventing Defendants from in any way further threatening, harassing, extorting, blackmailing, wiretapping, hacking, video and audio recording, contacting, communicating, emailing, texting, or using any and all illegally obtained information through the herein described illegal means in order to harass, threaten, extort, blackmail, obtain money from, sue, annoy, alarm Plaintiff in any manner in any capacity, pending a Hearing on the Merits and the conclusion of the above referenced federal/state/local investigations.
5. Plaintiff also requests that this Honorable Court make this case with an Anonymous Caption due to the multiple, extremely sensitive, confidential current and pending federal/state/local criminal and ethics investigations, as well as extremely sensitive confidential email communications by and between

Plaintiff and law enforcement, contained within the Exhibits and throughout.

6. In line with the above, the exhibits attached hereto, are:

(a) 2 Previous Orders of Protection issued by the NY Family Court **(Exhibit A)**;

(b) the NY Criminal Court **(Exhibit B)** to protect Plaintiff;

(c) Correspondence with 2 NY FBI Special Agents to protect Plaintiff, 4 NYPD Detectives to protect Plaintiff, 3 Manhattan Assistant District Attorneys to protect Plaintiff **(Exhibit C)**;

(d) Recent Criminal Complaints to FB IC3 for extensive hacking/deletion/malware installation of Plaintiff's Computers and I-Phone and Emails and Texts and Voicemails, wiretapping, extortion, harassment, aggravated harassment, blackmail, threats, physical/mental/emotional/psychological abuse, illegal audio and video recording of Plaintiff inside and outside his home and law office by Defendants of Plaintiff **(Exhibit D)**;

(e) Complaints to the Ohio and New York Attorney Disciplinary Committees for massive ethics violations, threats, extortion, blackmail, harassment related to the above criminal conduct as well as massive conflicts of interest pursuant to Model Rules 1.6, 1.7, 1.8, 1.9, 1.10, 1.18 **(Exhibit E)**;

(f) Various NYPD Police Criminal Complaint Reports against Defendants all showing current and pending criminal investigations against Defendants **(Exhibit F)**;

(g) previous FBI IC3 complaints against Defendant Matt O'Buck for hacking, threats, deletion of emails, texts and voicemails **(Exhibit G)**;

(h) an "admission" by Defendant Roger Blank that they illegally obtained "expert computer forensics" on Plaintiff's law firm computers and I-phone **(Exhibit H)**;

(i) which according to our expert computer forensics investigator, Anthony Mele **(Exhibit I)** violated the rules of privacy, unlawful trespass, digital breaking and entering, snooping, extortion, blackmail, threatening, ethics, divulging compromising or proprietary information if Plaintiff doesn't pay them, "ransom," creating a "hostage" scenario, password stealing/theft, computer hacking, computer virus planting, spyware installation, ransomware installation, and other torts/crimes;

(j) Computer Forensic Expert Anthony Mele also encloses an article by the American Bar Association entitled "Forensic Examination Of Digital Devices In Civil Litigation: The Legal, Ethical and Technical Traps" **(Exhibit J)** as supporting

information to offer his expert opinion on the admissions/statements of Defendant Roger Blank;

(k) We include "*Computer Crime Statutes*" by state (**Exhibit K**) as further supporting documentation of what Defendants have done to Plaintiff thus further necessitating the issuance of a Temporary Restraining Order on an urgent and immediate basis;

(l) Plaintiff has also advised the Court that his life, his childrens' lives, and other loved ones/friends and family's lives would be in danger by this type of leaking/release of compromising information by Defendants, as well as this unlawful hacking still seems to be occurring as was reported to both the NY FBI and Spectrum Business (**Exhibit L**);

(m) In the Second Amended Complaint we added the New York Field Office of the FBI as well as the NYPD (**Exhibit M**) because in our opinion their acts and omissions, over the past 10 years, and suspected active coaching of some or all of the other defendants, have not only contributed to this blackmail/hacking/extortion operation, but they may have in fact created it under the super aggressive and corrupt practices of the now outlawed FBI/DOJ COINTELPRO program, and the currently in force and in effect FBI/DOJ "Community Oriented Policing" program, also known as "COPS" because of Plaintiff's outspoken political dissidence, author of 2 books exposing the "Deep State," vocal support of peace with Iran stemming from his trip with the Network 20 organization in 2006, peace with Russia, anti-war writings for more than 20 media publications, and other political dissident writings - upon information and belief the FBI Office of Professional Responsibility, U.S. Department of Justice Office of Professional Responsibility, NYPD Internal Affairs Bureau, U.S. Department of Homeland Security Civil Liberties Division, and other oversight agencies are currently investigating these allegations;

(n) In the Third Amended Complaint we are adding Joe Hendrix and Andre De Castro as defendants (**Exhibit N**) because in line with the Civil RICO aspect of our claims these 2 individuals who admitted to knowing and doing business with co-defendant Nicola Shapiro for 10 or more years, and suspiciously "introduced" Plaintiff to arch-criminals Nicole Matties and Nicola Shapiro at undersigned Plaintiff's July 4th party in 2017, defrauded and physically threatened undersigned Plaintiff of \$20,000 in an elaborate Securities Fraud scam as detailed in **Exhibit N** - undersigned was advised by the United States Securities Exchange Commission ("SEC") to pursue a private lawsuit against these 2 individuals and their cryptocurrency scam ICO company, "BlockChainOfThings.com," and undersigned has also fully cooperated with the NY FBI, NY Attorney Generals Office, the U.S. Southern District of New York Criminal Division, and other law enforcement/regulatory agencies to both report and recoup his original investment as well as any and all dividends owed to him by virtue of this bogus ICO - to date undersigned has not seen a

penny of his original investment returned, let alone the promised dividends after their ICO thereof;

(o) In this Fourth Amended Complaint we are adding Jamie Wozman, Mark Anesh, Corey Cohen, A Michael Furman (**Exhibit R**) and Paula Ashcraft as defendants (**Exhibit S**) because in line with the Civil RICO aspect of our claims these individuals conspired with the other defendants to purposefully, criminally, illegally, and unethically encourage the other defendants to openly and in contempt of court not appear for the TRO Hearing on November 7, 2018 at 9:30 AM in front of the Hon Judge Barbara Jaffe at 60 Centre Street, Room 341, New York NY, and also sabotaged service of process (and thus delay) for that TRO court date by possibly taking bribes or money from one of the defendants, Aaron Minc and Daniel Powell of the Minc Law Firm, since both Paula Ashcraft of GreenTree Legal Process Servers and the Minc Law Firm are both located within minutes of each other in Ohio, and probably do a great deal of business together, and only notified Plaintiff that Roger Blank was possibly not served properly immediately right after the November 7, 2018 court hearing via email, and they only sent Plaintiff the affidavits of service for "all parties served" in the early morning hours of the November 7, 2018 court appearance, when Plaintiff had no time to review in-depth those affidavits, even though Paula Ashcraft had 5 days to get those affidavits to Plaintiff - currently the NYS Departmental Disciplinary Committee First Department and the Federal Bureau of Investigation (and other federal/state/local agencies) are investigating these allegations;

7. As was stated above, Defendants have written to Plaintiff that he had only 7 days from October 5, 2018 to pay them \$300,000 in cash otherwise they would leak/release such illegally obtained information and audio/video recordings as described above and herein, to the public, in order to terrorize, blackmail, extort, threaten, humiliate, embarrass, and harass the Plaintiff and his family and business.
8. Defendants have in their demand letter tied in and linked up nicely the individuals in the hacking, wiretapping, recording, theft of documents and data, blackmail and extortion operation from these individuals, many of whom have already been arrested, have outstanding arrest warrants, or are currently being investigated for the exact same crimes that they are being accused of on the internet, thus forming the basis of a Civil Racketeering Influenced and Corrupt Organization ("RICO") claim.
9. What links all of them, and the only individuals who seem to know all of this information on Douglas Senderoff and the other named individuals, is convicted prostitute madam/escort Nicola Shapiro, who also has colorful news articles all over the internet including the NY Post, and her protégé and also high class escort, Nicole Matties, who was also recently investigated and then arrested this past summer for her blackmail, extortion, threats, harassment, physical and emotional abuse, narcotics use, prostitution, violating court orders, and other various antics.

10. All the Defendants have either been investigated or arrested for the various crimes listed above, in addition to physical and emotional abuse, child abuse, illegal narcotics use and trafficking, sexual abuse, rape, blackmail, extortion, harassment, aggravated harassment, stalking, threats, violating court orders, prostitution, soliciting prostitution, internet defamation of Plaintiff, hacking, and other such wonderful criminal acts.
11. All of these gang stalker Defendants are all currently being investigated by federal, state and local law enforcement, by no less than 4 NYPD Detectives, 2 FBI Special Agents, and 3 Assistant District Attorneys, who Plaintiff is constantly in touch with, for gang stalking harassment, hacking of my computers and I-phone, emails, voice mails, texts, deleting my emails/texts/voice mails, recording and wiretapping of me both inside and outside of my home and office for extortion/blackmail purposes, and other such wonderful pursuits.
12. My ex wife Sharie O'Buck (aka Sharie Kruzic, Sharie Manon, Sharie Maes, Valerie Johnson) in coordination with her husband Matt O'Buck, an AT&T Wireless IT Expert and self-professed hacker, are completely and totally also behind this organized gang-stalking and harassment, as Matt O'Buck told me in NY Family Court last year that he "knew Nicole Matties from Canada."
13. These people are even threatening and calling my current girlfriend Sylvia Madej's family and past employers in Poland to scare, threaten and harass her and her family as well, and I also reported this to the NYPD 20th Precinct.
14. These people are apparently and allegedly holding in their hand, the "fruit of this poisonous tree," and are also using it to extort, blackmail, intimidate, threaten, mock and try to extract \$300,000 dollars from Plaintiff in 7 days from receipt of their extortion letter.
15. Even though Plaintiff categorically denies each and every one of their allegations in their extortion letter, they are not the only one with "evidence."
16. And since I sit on the Board or am an active contributor to no less than 20 Jewish/Israeli/Zionist organizations for the past 20 years, and am an active civil rights lawyer writing books and articles fighting racism against African-Americans and even filed several federal lawsuits as such, I find their allegations of "racism" preposterous.
17. During the roughly 1 year long live-in relationship between approximately July 4, 2017 to approximately June 18, 2018, when Nicole Matties (who had exclusive access to my I-phone and computers/laptops, as well as my files) was arrested, I had video cameras and audio recorders in nearly every room of my apartment which we shared together, and I have hundreds of hours of recordings, written statements, sworn notarized affidavits, and

other corroborating statements wherein Nicole Matties, buttressed and supported by Nicola Shapiro, repeatedly stated the exact same things written in internet postings.

18. The vast majority of the time I felt bad for, and believed Nicole Matties as a supposed "victim" of her "past life" as a high class prostitute forced to work for Nicola Shapiro, about the horrific comments and statements that she made about these former "clients" and "johns" referred to and forced on her by her "pimp" or "madam" Nicola Shapiro, and others in that "clique" that Defendants named, and I wanted to protect her, because in fact, I did love her.
19. Indeed Nicole Matties even filed a lawsuit in NY Civil Court against Nicola Shapiro with notarized statements under penalty of perjury, that Nicola Shapiro in fact, wrote defamatory internet postings about her and others.
20. And I also have written texts and evidence that Nicola Shapiro and Nicole Matties admitted to writing those internet postings, intermittently.
21. When Nicole Matties and Nicola Shapiro weren't fighting and threatening to arrest each other for such things as "stealing each other's clothes," or "not paying each other for sex with their assigned johns/sex referrals," and other such wonderful activities, they were going on and on about the negative aspects of those individuals that Defendants name in their extortion letter, including their client Douglas Senderoff, in great and gory detail.
22. Nicole Matties even showed me pictures of Defendant Douglas Senderoff standing next to his orange Lamborghini as well as other texts and salacious comments.
23. After Nicole Matties was arrested on June 18, 2018 (I didn't press charges or sign the supporting deposition because I'm a nice person, not revengeful or vindictive) I came to find out that many of the women that I later met on various dating websites were friends/associates of Nicole Matties and Nicola Shapiro, pretending not to know them but then appearing as their "friends" and "contacts" on social media sites such as InstaGram, FaceBook and other places, such as Devina Peccolina and many, many others.
24. To think that many of these "Trojan Horse" women that I dated after Nicole Matties' arrest on June 18, 2018 stayed at my home for days, if not weeks, often when I was at work.
25. As this Court knows, I have been aching to get into either a state or federal courtroom for more than 10 years now, to go after, name and shame my blackmailers and extortioners who have succeeded in, as Defendants describe their client, exposing me to "various forms of opprobrium and disgrace in my community and profession," with the internet "littered with salacious and vile

accusations of serious criminal activities, professional misconduct, and morally repugnant behavior, thereby causing immense harm to my good name but also my professional reputation and business interests, not to mention the resulting mental anguish and unbearable emotional distress."

26. The problem is (as this court and defendants know, because Defendant Aaron Minc so wonderfully counseled and advised me over the past 5 years, even sending me case law such as Hassel v Bird) that I kept getting kicked out of court, and not allowed to pursue my allegations against my defamers, many of whom appear in the extortion letter of Defendants, and many of whom will also be cross-complained, impleaded, and named as co-defendants.
27. The difference now, however, is that I actually have court orders naming some of the Defendants as my internet defamers with orders to remove their postings, as well as other legal and court documentation showing that many of the defendants are, in fact, complete and total scumbags, not the "angels" that Defendants try and portray them in their extortion letter.
28. Now that Defendants have linked all of these gang stalking individuals in their little international prostitution/high-class escort/narcotics use and trafficking ring, with a splash of "Israeli Intelligence" (Nicola Shapiro, aka Nava Shapiro, was very fond of telling everyone repeatedly that she worked for Israeli Intelligence for 9 years, a fact that the 2 FBI Special Agents who interviewed me before Nicole Matties' arrest in June 2018 found to be very interesting) I will have no problem now in bringing them all to this "litigation party," where everyone can be cross examined, deposed, and provide exhaustive discovery relating to their bad habits, defamation, and criminal conspiracies (including Nicole Matties who herself told me that Defendant Douglas Senderoff simply loves high-class prostitutes/escorts such as herself, is "cheap," has a "small dick," beats, drugs and rapes women, girls and prostitutes, as well as that he is supposedly a terrible doctor who repeatedly asked Nicole Matties and other females for sex in exchange for cosmetic surgery).
29. The Israeli Intelligence link is most interesting since (as Defendants know) I have been an active and prolific author and alternative media contributor for 20 plus online and print media journals, authoring 2 books, supporting Palestinian rights and vocally and vociferously against war with Iran, stemming from my trip there in 2006-2007.
30. It would be interesting to subpoena Douglas Senderoff's and other Defendants' text messages, phone records, dating site memberships, conversations he has had with hundreds of prostitutes, etc, all for the public record and into perpetuity for all the world to see.
31. The same goes for the other miscreants in Defendants' extortion letter.

32. In fact all of these names and information came from either Nicole Matties or Nicola Shapiro, or both, gleaned within the scope and duties of their international prostitution/drug racket, over many years in their illustrious careers, and they should really be the targets of Defendant Douglas Senderoff's wrath.
33. Certainly I will not be paying Defendants \$300,000, nor do I have such a huge amount of money in my possession.
34. The simple fact is that the real target of Defendants wrath should be the one that they have ironically lionized and praised, that being Nicole Matties.
35. She is the only one who actually knew all of these names and information, provided this information, spread and dispensed this information, and met and knew all of these people in Defendants' extortion letter.
36. And her sidekick (some would say "madam" or "pimp") Nicola Shapiro is also equally culpable in this extortion racket.

CAUSES OF ACTION AGAINST DEFENDANT

37. Plaintiff repeats and realleges each and every allegation contained in paragraphs 1 through 36 of this Complaint.
38. Therefore Plaintiff seeks a permanent injunction against Defendants, their aides and assigns, from leaking, using, or aiding another to leak or use, such illegally obtained information or audio/video recordings, in any capacity, for any purpose.
40. Plaintiff seeks \$100,000,000 in compensatory and punitive damages stemming from Defendants unlawful trespass and for:
 - (A) extortion,
 - (B) blackmail,
 - (C) harassment,
 - (D) aggravated harassment,
 - (E) threats,
 - (F) intimidation,
 - (G) hacking,
 - (H) theft of documents and information,
 - (I) wiretapping,
 - (L) audio and video recording of Plaintiff both inside and outside his home and office,
 - (M) installation of eavesdropping/ virus/ malware software on his computers, laptops, I-Phone, and other technology,
 - (N) the deletion of his personal/law firm/business emails, the deletion of his personal/law firm/business voicemails,
 - (O) the deletion of his personal/law firm/business texts, and
 - (P) other damages pursuant to the **Civil RICO** statutes in joint and several liability,
 - (Q) violating federal wiretapping laws,
 - (R) laws against extortion,

- (S) blackmail,
- (T) internet defamation/slander/libel of Plaintiff,
- (U) illegal and unauthorized video and audio recording;
- (V) securities fraud.

WHEREFORE, Plaintiff requests:

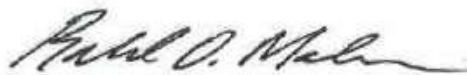
(1) a permanent injunction against Defendants, their aides and assigns, from leaking, using, or aiding another to leak or use, such illegally obtained information, and

(2) Plaintiff seeks \$100,000,000 in compensatory and punitive damages stemming from Defendants unlawful trespass and for:

- (A) extortion,
- (B) blackmail,
- (C) harassment,
- (D) aggravated harassment,
- (E) threats,
- (F) intimidation,
- (G) hacking,
- (H) theft of documents and information,
- (I) wiretapping,
- (L) audio and video recording of Plaintiff both inside and outside his home and office,
- (M) installation of eavesdropping/ virus/ malware software on his computers, laptops, I-Phone, and other technology,
- (N) the deletion of his personal/law firm/business emails, the deletion of his personal/law firm/business voicemails,
- (O) the deletion of his personal/law firm/business texts, and
- (P) other damages pursuant to the **Civil RICO** statutes in joint and several liability,
- (Q) violating federal wiretapping laws,
- (R) laws against extortion,
- (S) blackmail,
- (T) internet defamation/slander/libel of Plaintiff,
- (U) illegal and unauthorized video and audio recording;
- (V) securities fraud.

(3) such other and further relief as the Court deems just and proper, including applicable interest and the costs and disbursements of this action.

Dated: New York, NY
November 11, 2018



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